

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

BETTYE J. TURNER,

Plaintiff,

-against-

ZIMMER, INC.; ZIMMER HOLDINGS, INC.;
WILSON/PHILLIPS HOLDINGS, INC. a/k/a ZIMMER
WILSON PHILLIPS AND ZIMMER ORTHOPAEDIC
SURGICAL PRODUCTS, INC.,

Defendants.

CASE NUMBER:
1:11-cv-5146-DLC

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Declaration of Phoebe A. Wilkinson in Support of the Zimmer Defendants' Motion to Stay Pending Transfer to Multidistrict Proceeding, executed on August 31, 2011, the exhibits thereto, the Memorandum in Support of the Zimmer Defendants' Motion to Stay Pending Transfer to Multidistrict Proceeding, and all other pleadings and proceedings had herein, the defendants, Zimmer Surgical, Inc. (f/k/a Zimmer Orthopaedic Surgical Products, Inc.), and Wilson/Phillips Holdings, Inc. (collectively, "the Zimmer Defendants"), by their attorneys Chadbourne & Parke LLP, respectfully move this Court, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, to stay all proceedings, including but not limited to any deadline to answer or otherwise respond to the Complaint, the period for initial disclosures pursuant to Rule 26, and all other discovery and pretrial deadlines, pending transfer of this action to the Northern District of Illinois as part of multidistrict proceedings styled *In Re: Zimmer NexGen Knee Implant Products Liability Litigation*, MDL No. 2272 ("MDL-2272").

Dated: August 31, 2011

Respectfully submitted,

/s/Phoebe A. Wilkinson

Phoebe A. Wilkinson, Atty No. PW-3143

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